

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
ART ASSURE LTD. LLC,

Plaintiff,

14 Civ. 3756 (LGS)

-against-

NOTICE OF CROSS  
MOTION

ARTMENTUM GMBH, MICHAEL SCHULZ,  
THOMAS BURKHALTER, ELIANE PIDOUX,  
INTERNATIONAL CORPORATE ART  
CONSULTING, KEVIN WYNN,  
KLAUS MATUSWESKI, HANS-BERT MOLL, and  
DZ PRIVATBANK,

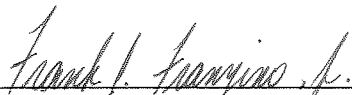
Defendants.  
-----X

PLEASE TAKE NOTICE that upon the Affidavit of Asher Edelman, dated August 7, 2014 and the accompanying Memorandum of Law, the undersigned will move this Court before the Honorable Lorna G. Schofield, United States District Judge, United States Courthouse, 500 Pearl Street, New York, New York, for an order: (a) granting limited discovery in aid of jurisdiction; (b) staying defendants' motion to dismiss pending the conclusion of such limited discovery in aid of jurisdiction; and for such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the briefing schedule entered by the Court, defendants' opposition to the plaintiff's cross-motion shall be filed by August 29, 2014 and plaintiff's reply to cross-motion shall be filed by September 12, 2014.

Dated: New York, New York  
August 8, 2014

Respectfully submitted,

  
\_\_\_\_\_  
Frank J. Franzino, Jr. (FF 9740)  
FRANZINO & SCHER, LLC  
900 Third Avenue, 17<sup>th</sup> Floor  
New York, New York 10022  
(212)230-1140  
[ffranzino@franzscherlaw.com](mailto:ffranzino@franzscherlaw.com)

*Attorneys for Plaintiff*